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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE TEZOS SECURITIES LITIGATION

Case No: 3:17-cv-06779-RS

This document relates to:

ALL ACTIONS

**CLASS ACTION**

**DECLARATION OF KATHLEEN  
BREITMAN PURSUANT TO CIVIL  
LOCAL RULE 79-5(e)**

Judge: Hon. Richard Seeborg  
Courtroom 3

1 I, Kathleen Breitman, hereby declare as follows:

2 1. I am the Chief Executive Officer of Dynamic Ledger Solutions, the entity named as a  
3 defendant in this lawsuit. Unless otherwise stated I have personal knowledge of the facts contained  
4 herein and if called to testify could and would testify competently thereto.

5 2. Exhibits M and W to the Declaration of Hung Ta, submitted in support of Plaintiffs'  
6 Motion for Class Certification in the above-captioned action contain my personal telephone number.  
7 Putting this number into the public record could cause me harm.

8 3. I and my husband Arthur Breitman (the Chief Technology Officer of Dynamic  
9 Ledger Solutions) are well known figures in the crypto-currency and blockchain fields. There are  
10 accordingly numerous persons who, if given the opportunity, would seek to harass, embarrass,  
11 threaten, or harm us personally. While there are a wide range of possible motivations for such  
12 conduct, many malicious actors seek to target us and our associates simply for sport or to obtain  
13 fame and recognition online.

14 4. My husband and I have been subjected to such harassment in the past, particularly at  
15 times when the Tezos Project or Dynamic Ledger Solutions were the subject of media attention. In  
16 the most extreme cases, people threatened to kill us or otherwise cause us physical harm. I have  
17 attached two examples of such threats, one directed at myself and the second directed at Arthur  
18 Breitman as Exhibits 1 and 2 to this declaration respectively. Additionally, I am aware that the lead  
19 plaintiff in this lawsuit Arman Anvari once posted what I took as a threat directed at me me on a  
20 public message board, writing "pretty lady,,,, please send tezos or I kill u."

21 5. Based on our past experiences and my own knowledge, disclosing my personal  
22 phone number could and very likely would be used to harm us. For instance, knowing our phone  
23 numbers could be used to flood us with spam voicemails or to issue direct threats.

24 6. Exhibit R contains the phone number associated with one of our associates at the  
25 Digital Currency Group ("DCG"). I understand that this is not a public number. I believe that  
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1 putting this number into the public record could cause harm to DCG based on their affiliation with  
2 us as our business partners and associates have been targeted in the past much as we have.  
3

4 I declare under penalty of perjury under the laws of the United States that the foregoing is true and  
5 correct. Executed on January 14, 2019 in Miami, Florida.  
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9 Kathleen Breitman  
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